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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
FILE #.
DATE FILED: 7/30/19

July 29, 2019

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By ECF and Facsimile

The Honorable Alvin K. Hellerstein
United States District Judge for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Frank Dinucci, Jr.*, No. 18 Cr. 00332 (AKH)

Dear Judge Hellerstein:

We write on behalf of our client, defendant Frank Dinucci, Jr., who has been released pending sentencing pursuant to an appearance bond dated April 6, 2017. We submit this letter respectfully to request that Mr. Dinucci's travel restrictions be modified to permit him to travel to the Eastern District of Pennsylvania on the condition that, prior to the trip, he submits a travel itinerary to Pretrial Services setting forth his transportation and lodging information. AKH

Mr. Dinucci seeks this travel expansion because he would like to attend his nephew's birthday celebration at his brother's house located in Westchester, PA from August 2 through August 4, 2019.

Mr. Dinucci's travel had initially been restricted to the Southern and Eastern Districts of New York, the District of Connecticut, the District of South Dakota, Districts within Ohio, and travel to allow him to reach those Districts.

On May 25, 2017, the Court enlarged Mr. Dinucci's travel restrictions to include the District of New Jersey, the District of Nevada and Districts within the states of California and Florida, provided that Mr. Dinucci gives advance notice of his travel itineraries to Pretrial Services and obtains approval for his travel to those Districts from Pretrial Services.

On August 14, 2017, the Court further enlarged Mr. Dinucci's travel restrictions to include certain Districts within the states of Michigan and Texas, provided that Mr. Dinucci gives advance notice of his travel itineraries to Pretrial Services and obtains approval for his travel to those Districts from Pretrial Services.

On September 11, 2017, the Court further enlarged Mr. Dinucci's travel restrictions to include the Western District of Pennsylvania, provided that Mr. Dinucci gives advance notice of his travel itineraries to Pretrial Services and obtains approval for his travel to those Districts from Pretrial Services.

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On March 16, 2018, the Court further enlarged Mr. Dinucci's travel restrictions to include the Western District of Texas and the Central District of California, provided that Mr. Dinucci gives advanced notices of his travel itineraries to Pretrial Services and obtains approval to those Districts from Pretrial Services.

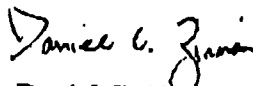
On May 24, 2018, the Court further enlarged Mr. Dinnuci's travel restrictions to include all Districts with Washington DC, Virginia, Colorado, Arizona, Louisiana, Minnesota, Massachusetts, South Carolina, Missouri, Georgia and North Carolina, provided that Mr. Dinucci gives advanced notices of his travel itineraries to Pretrial Services and obtains approval to those Districts from Pretrial Services.

On June 22, 2018, the Court further enlarged Mr. Dinnuci's travel restrictions to include all Districts within Michigan, Texas and Maine on the condition that, prior to any trip, he submits a travel itinerary to Pretrial Services setting forth his transportation and lodging information.

We now request that Mr. Dinucci's travel restrictions be enlarged to include the Eastern District of Pennsylvania on the condition that, prior to any trip, he submits a travel itinerary to Pretrial Services setting forth his transportation and lodging information.

Pretrial Services Officer Assistant Madalyn Toledo and AUSA Andrea Griswold both consent to this request.

Respectfully submitted,



Daniel C. Zinnman

cc: AUSA Joshua A. Naftalis (via e-mail)
AUSA Andrea M. Griswold (via e-mail)
Officer Assistant Madalyn Toledo, U.S. Pretrial Services (via email)